

Organisation of hazardous and radioactive waste management (follow-up audit)

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Summary of audit results

The National Audit Office has thoroughly audited the handling of hazardous and radioactive waste in 2015 and in 2018.

The Ministry of the Environment has not made any decisions to improve the management of hazardous waste following the 2018 audit by the National Audit Office, nor has it been able to develop a functioning form of management for the Vaivara Hazardous Waste Management Centre in which waste producers cover all the costs related to the landfilling of hazardous waste and operation of the centre.

Preparatory work for the establishment of the final man-made radioactive waste repository has started, but there are no funds for long-term financing of the final repository by the state.

Most important conclusions of the audit

In the 22 years of the Vaivara Hazardous Waste Management Centre (HWMC) being in state ownership, the Ministry of the Environment has not been able to ensure the self-sufficiency of the centre and is not sure that it will be able to do so in the future. This goes against the principle that polluters must cover all their own costs.

- The management contract of the Vaivara HWMC expires in 2023. The current management model of the centre has not justified itself, but a decision to change it has not yet been made. Continuing in the same vein means that the Ministry of the Environment will continue to support the centre, using taxpayers' money.
- The costs related to the closure of the landfilling site are greater than the funds collected for this purpose, and the state has also covered other costs related to the management of the Vaivara HWMC. It is still necessary to find funds in the state budget to maintain the centre.
- When making future plans for the management of the centre, it must be taken into account that with the current landfilling volumes and pace, the expansion of the landfilling site planned by the Ministry of the Environment will fill up in 10–12 years, the location of the centre may not be attractive to handle non-landfillable waste, and when including the actual costs in the service charge, the service charge would be twice as high as it is currently.



The owner of Vaivara HWMC is the Ministry of the Environment, the administrator is the Environmental Agency, and the day-to-day operator is a private company.

Photo: National Audit Office

The Ministry of the Environment wants to invest

4.28 million euros

in the expansion of the Vaivara Hazardous Waste Management Centre.

For this purpose, they would also like to use the funds of the Ida-Viru County Just Transition Fund.

The Ministry of the Environment in cooperation with the Ministry of Economic Affairs and Communications and the Ministry of Finance have not found a solution for the long-term financing of the establishment of a final repository for man-made radioactive waste in order to ensure its completion by the deadline in 2040.

- The establishment of the final repository is a time-critical project where delays call its timely completion into question and lead to increased costs. The activities preceding the design of the repository have already been delayed and the cost is twice as high (15 million) as originally planned.

The total cost of the establishment of the final repository of man-made radioactive waste was estimated at

90 million euros

in the national active plan for radioactive waste prepared in 2019.

In reality, it will probably be considerably more expensive.



The website of AS A.L.A.R.A. (which is responsible for the management of the former Paldiski nuclear facility) counts days remaining until the obligation to demolish the old nuclear reactors in 2040 (screenshot as of 13 May 2022).

Source: website of AS A.L.A.R.A.

Most important recommendations of the National Audit Office

- As soon as possible, make a decision about the form of management of Vaivara Hazardous Waste Management Centre, which would ensure the long-term operation and self-sufficiency of the centre, taking into account all the potential circumstances, incl. the filling of the landfilling site, location of the centre, and a potential price of the landfilling service that takes all costs into account.
- The Ministry of the Environment in cooperation with the Ministry of Economic Affairs and Communications and the Ministry of Finance should apply for funding from the state budget strategy for the establishment of the final repository for man-made radioactive waste, as a priority activity, by 2024–2026 at the latest, or for a longer period, if possible.

Response of the Ministry of the Environment:

The Minister of the Environment explained that the strategic environmental impact assessment of the Vaivara HWMC complex, updating of the detailed land use plan and implementation of the preliminary construction project has commenced. According to the Minister, these activities should ensure that the ability to deposit hazardous waste is maintained in the long-term including in exceptional situations and in the case of hazardous waste that a privately owned handler is not willing to accept under market conditions. According to the Minister, the impact assessments, detailed land use plan and the preliminary construction project will be completed in 2023.

In addition, the Ministry of the Environment is planning to prepare a separate action plan for Vaivara HWMC in 2022, which also includes the issue of the form of ownership. According to the Minister of the Environment, the Vaivara complex should be planned in such a way that in the case of hazardous or other waste with market failure, recycling

would be encouraged and landfilling would be the last solution, while the capacity for landfilling should be maintained for as long as possible.

The Minister of the Environment assured that the project of the final repository for man-made radioactive waste is extremely important. As such, the Minister submitted an additional request in the total amount of 5,466,666 euros (exclusive of value added tax) for 2023–2025 to the state budget strategy for the special land use plan and impact assessment as well as studies in the spring of 2022.